

CUSTY LAW FIRM, LLC
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Hearing Date: February 14, 2019
Time: 10:00am

Counsel to Jenny Yednak and Ronald Yednak
(pro hac vice admission pending)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re:	:	Chapter 11
	:	
Sears Holding Corporation, et al.,	:	Case No. 18-23538-rdd
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

NOTICE OF MOTION OF JENNY YEDNAK & RONALD YEDNAK FOR AN
ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE, that upon the annexed application dated January 21, 2019, Jenny Yednak and Ronald Yednak, by and through their undersigned counsel, will move this Court before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on February 14, 2019 at 10:00 a.m., or as soon thereafter as counsel may be heard, for entry of an Order, pursuant to 11 U.S.C. § 362(d)(l) and Rule 4001 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), modifying the automatic stay arising in these chapter 11 cases so as to permit the continuation of an action pending in the Circuit Court of Cook County, Illinois, Law Division, Cause No. 2018-L-007065 captioned *Jenny Yednak and Ronald Yednak v. Sears Roebuck & Company, SRC Facilities*

Statutory Trust No. 2003-A, SRC Facilities LLC and Amy Kelso Sikorski and granting such other and further relief as this Court may deem just and proper (the "Motion").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be made in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for United States Bankruptcy Court for the Southern District of New York, set forth the name of the objecting party, the basis for the objection and the specific grounds therefor, be filed with the Court with a copy to the chambers of Honorable Robert D. Drain, together with proof of service thereof, and be served in a manner so as to be received by Custy Law Firm, LLC, 4004 Campbell Street, Suite 4, Valparaiso, Indiana 46385, Attn.: Brian Custy, Esq., not later than February 7, 2019 at 4:00 p.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, if no Objections are timely filed and served with respect to the Motion, the relief requested may be granted without a hearing.

Dated: January 22, 2019

CUSTY LAW FIRM, LLC

By: /s/ Brian Custy

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